



1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000
FAX 202.719.7049

7925 JONES BRANCH DRIVE
McLEAN, VA 22102
PHONE 703.905.2800
FAX 703.905.2820

www.wileyrein.com

July 19, 2011

M. Ethan Lucarelli
202.719.7299
elucarelli@wileyrein.com

ELECTRONIC DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Notice of *Ex Parte* Communication
PS Docket No. 10-255**

Dear Ms. Dortch:

On July 12, 2011, Mario DeRango, Vice President, Advanced System Architecture, Tony Palcheck, Managing Director, Motorola Solutions Venture Capital, and Terry Eby, Advanced Systems NG911 Senior Architect, of Motorola Solutions, Inc. (“MSI”) spoke with Amy Levine, Senior Counsel and Legal Advisor to Chairman Genachowski regarding Next Generation 911 (“NG911”). Consistent with its previously filed comments on these issues, MSI described the NG911 services and architecture,¹ the liability concerns that must be addressed to move forward with NG911 deployment and industry support,² and the need for secure funding for state and local NG911 deployments.³

Specifically, MSI explained to the Commission that NG911 enables 911 callers to communicate with public safety answering points (“PSAPs”) through a variety of new media, including sending images, video, and text messages, in addition to placing a 911 voice call. MSI also explained that, based upon the NENA i3 specifications, the NG911 architecture is composed of an all Internet Protocol (“IP”) based Emergency Services IP network (“ESInet”) that connects originating communications services providers, broadband Internet service providers, and 911 content, service, and application providers to PSAPs.

The Commission also asked what rules are needed to support NG911 implementation. MSI suggested that any future Commission rulemaking should

¹ See Comments of Motorola Solutions, Inc. at 1-2, 5-8, PS Docket No. 10-255 (filed Feb. 28, 2011).

² See *id.* at 12-13.

³ See *id.* at 9-11.



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focus on promoting communications service provider support of the new NG911 services, as without direct support of their portion of the NG911 functional architecture, the system will not work as intended. MSI also discussed the need for adequate liability protections to ensure that communications service providers and PSAPs feel secure in adopting and implementing the new technologies and communications media.

In addition, the Commission asked about whether NG911 funding should be provided to federal entities or directly to state and local entities. MSI suggested that state and local public safety agencies should receive funding because they are the direct providers and managers of 911 services. State and local agencies are taking the lead on early deployment of IP-based PSAPs today, and they are most familiar with the specific needs and existing communications resources (including state and local fiber backbones) that are already available to be leveraged.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed electronically in the above-referenced docket.⁴

Respectfully Submitted,

/s/ M. Ethan Lucarelli

M. Ethan Lucarelli
Counsel to Motorola Solutions, Inc.

CC: Amy Levine